

GMDSS Task Force  
1600 North Oak Street; #427  
Arlington VA 22209

5 July 2007

**Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554**

In the Matter of

Amendment of the Commission's Rules	)	WT Docket No. 04-344
Regarding Maritime Automatic	)	DA 07-2597
Identification Systems		

**COMMENTS OF THE TASK FORCE FOR THE IMPLEMENTATION OF  
THE  
GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)**

The GMDSS Implementation Task Force respectfully submits these Comments in response to Public Notice No. DA 07-2597 released June 14, 2007.

The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broad based including over 1600 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at [www.navcen.uscg.gov/marcomms](http://www.navcen.uscg.gov/marcomms) which contains

numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings. Even though AIS is not technically a GMDSS system, the Task Force has taken the initiative to extend its areas of interest to include other maritime radio systems of current interest to the maritime community. This filing is consistent with our comment on WT Docket No. 04-344 filed 5 November 2006.

#### **Class B AIS Shipborne Equipment**

The Task Force supports the Commission's proposal to amend the Part 80 rules to incorporate by reference the IEC 62287-1 standard and provide for the certification of Class B AIS equipment that complies with that standard. The Task Force specifically recommends that the Part 80 Rules be waived to permit the approval of Class B AIS equipment meeting the IEC 62287-1 standard prior to the resolution of the rulemaking proceeding.

The Task Force understands that many voluntary vessels are interested in fitting the Class B AIS units to improve safety of navigation and that new Coast Guard regulations are likely to extend the required fitting of AIS equipment to numerous non-SOLAS vessels for the same reason. The Class B

AIS units would be appropriate for these non-SOLAS vessels and expeditious approval by the FCC is encouraged.

The Task Force further notes that the Maritime Mobile Station Identity (MMSI) used to identify users of both Digital Selective Calling (DSC) radios and AIS units are maintained in a database, the accuracy of which is vital for both National Security and Search and Rescue applications. The Task Force therefore calls attention to its 21 May 2007 Petition to the FCC to request that new policies and procedures be adopted to assure the accuracy of the MMSI database. The Task Force urges adoption of the various measures recommended in the Petition.

For the GMDSS Task Force

JACK FUECHSEL  
Director, GMDSS Task Force  
703-527-0484  
[gmdss@comcast.net](mailto:gmdss@comcast.net)

file: fcc-16.1.doc